UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JUDITH GODINEZ, Individually and on Behalf of All Others Similarly Situated, Plaintiffs, v. ALERE INC., *et al.*, Defendants.	Civil Action No. 1:16-cv-10766-PBS

JOINT [PROPOSED] SCHEDULING ORDER

The parties, by and through their undersigned counsel, hereby submit this Joint [Proposed] Scheduling Order pursuant to the Court's Order on August 23, 2017 (ECF No. 103).

Pursuant to Fed. R. Civ. P. 16(b) and Local Rule 16.1(f), it is hereby ORDERED that:

1. **Initial Disclosures.** The parties shall make their initial disclosures required by Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2(a) by October 16, 2017
2. **Proposed Confidentiality Order.** A proposed confidentiality order governing the parties' exchange of discovery shall be filed no later than October 16, 2017.
3. **Answer.** Defendants shall answer the Supplemental and Amended Consolidated Class Action Complaint (ECF No. 78) by November 3, 2017.
4. **Amendments to Pleadings.** Any motion to amend the pleadings or join any additional parties shall be filed by June 30, 2018.
5. **Fact Discovery.**
    a. Requests for the production of documents shall be served no later than May 18, 2018.
    b. The limit on the number of depositions for each side (or group of parties with common interest) contained in Local Rule 26.1(c) shall be increased to 20.
    c. The parties agree to substantially complete document production by February 28, 2018. The parties further agree to meet and confer, as may be appropriate, with regard to a reasonable document collection and production protocol, the prioritization of the production of documents from particular custodial sources, as well as the scheduling and sequencing of depositions.

d. Fact discovery, including all fact depositions, shall be completed by June 30, 2018.

6. **Class Certification.**

   a. Plaintiffs shall file their class certification motion and serve any related expert reports by February 1, 2018.

   b. Class certification-related discovery of Plaintiffs shall be completed by March 28, 2018.

   c. Defendants shall file any opposition papers to class certification and serve any related expert reports by May 1, 2018.

   d. Plaintiffs shall file any reply papers and serve any rebuttal expert reports in support of class certification by June 11, 2018.

   e. A hearing on the class certification motion shall be held on _______________ at _____am/pm.

7. **Expert Discovery.**

   a. Expert reports and Rule 26(a)(2) disclosures on issues for which any party has the burden of proof, other than those prepared in connection with class certification, shall be served by July 16, 2018.

   b. Rebuttal expert reports and Rule 26(a)(2) disclosures, other than those prepared in connection with class certification, shall be served by August 27, 2018.

   c. Expert depositions shall be completed by November 15, 2018.

8. **Dispositive Motions.**

   a. Any summary judgment motions shall be filed by December 17, 2018.

   b. Oppositions to any summary judgment motions shall be filed by February 11, 2019.

   c. Any replies in support of summary judgment motions shall be filed by March 4, 2019.

9. **Reservation of Rights.** The parties expressly reserve the right to seek an extension of any of the deadlines or limits set forth herein.

10. **Settlement Conference.** A settlement conference shall be held within thirty days after the Court rules on Plaintiffs' motion for class certification.

11. **Initial Pretrial Conference.** An initial pretrial conference shall be held on _________________ at _____am/pm.

Dated: September 25, 2017

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document, filed through the CM/ECF System, will be served electronically on the registered participants as identified on the Notice of Electronic Filing ("NEF") and paper copies will be sent to those indicated as nonregistered participants via first class mail this 25th day of September 2017.

/s/ *Richard A. Rosen*